



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

COLLIS, INC.

Clinton, Iowa

EPA ID No. IAD047303771



R00313208

RCRA RECORDS CENTER

Background

Collis operates a facility for the production of refrigerator shelving items. Collis purchased this facility from Chamberlain Manufacturing in 1981. The shelving is produced from rolled steel and wire stock, the processing of which generates electroplating wastes. The facility consists of a manufacturing building, six surface impoundments and settling tanks. The surface impoundments received electroplating wastes from the settling tanks from 1970 to 1979. The impoundments at the facility were operated by Chamberlain Manufacturing.

Because the impoundments at this facility were operated prior to 1980, the year RCRA became effective, EPA's jurisdiction over these impoundments under RCRA was raised as an issue. Because of this, negotiations were protracted and EPA entered into a consensual agreement with the facility on December 31, 1987.

On September 12, 1986, EPA conducted a RCRA CEI at Collis, during which ground water monitoring violations were noted for Collis' failure to locate ground water monitoring wells at the waste management boundary and failure to obtain and analyze ground water samples from all wells.

The Consent Agreement and Consent Order with Collis and Chamberlain required Collis to complete closure of the surface impoundments, submit a revised ground water monitoring plan that addressed EPA's comments and implement the ground water monitoring plan within 30 days of EPA approval. Chamberlain was required to pay for the completion of closure, which was previously agreed to by Collis and Chamberlain.

Closure

The closure plan for the six surface impoundments was approved by EPA on March 31, 1987. On October 1, 1987, Collis requested an extension to the closure time period. The approved

closure plan required submission of a ground water monitoring plan. On July 11, 1988, Collis submitted a revised closure timetable estimating that closure activities would be completed by September 30, 1988. This schedule was approved by EPA on August 11, 1988.

Closure of the surface impoundments has essentially been completed. All six of the surface impoundments are being closed. The facility has completed all field work and EPA is awaiting submission of closure certification.

Ground Water

A ground water monitoring plan was received from Collis on September 4, 1987 and comments on this plan were provided to the company on October 9, 1987.

On December 5, 1987, Collis submitted a revised ground water monitoring plan. On January 6, 1988, EPA provided comments to Collis regarding the revised ground water monitoring plan and advised that the ground water sampling and analysis plan must be reviewed before the ground water plan can be approved. EPA approved Collis' ground water sampling and analysis plan on June 13, 1988.

A Comprehensive Monitoring Evaluation (CME) was performed by contractors authorized by EPA under the TES IV contract in November 1988. A copy of the CME report was provided to Collis. Major ground water deficiencies were noted in the CME, including:

1. failure to adequately characterize the site hydrogeology;
2. failure to submit complete replicate sampling results; and,
3. failure to submit the groundwater assessment outline and ground water assessment report.

Splits of ground water samples collected during the CME indicated lead and chromium levels in excess of the Primary Drinking Water Standards. EPA concluded that further ground water assessment activities by the facility are necessary to determine the full horizontal and vertical extent of soil and groundwater contamination.

This contamination will delay the completion of closure because the contamination may have resulted from a release from the impoundments. Therefore, corrective action is likely to be needed.